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 ATTORNEYS FOR DEFENDANTS MINEONE WYOMING DATA CENTER, LLC,
 MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE LLC d/b/a BISON)
 BLOCKCHAIN, a Wyoming limited liability)
 company,)
)
 Plaintiff,)

Civil Action No. 23CV-79-ABJ

v.)
)
 MINEONE WYOMING DATA CENTER)
 LLC, a Delaware limited liability company;)
 MINEONE PARTNERS LLC, a Delaware)
 limited liability company; TERRA CRYPTO)
 INC., a Delaware corporation; BIT ORIGIN,)
 LTD, a Cayman Island Company;)
 SONICHASH LLC, a Delaware limited)
 liability company; BITMAIN)
 TECHNOLOGIES HOLDING COMPANY, a)
 Cayman Island Company; BITMAIN)
 TECHNOLOGIES GEORGIA LIMITED, a)
 Georgia corporation; and JOHN DOES 1-20,)
 related persons and companies who control or)
 direct some or all of the named Defendants.)
)
 Defendants.)

DEFENDANTS MINEONE WYOMING DATA CENTER, LLC, TERRA CRYPTO INC., MINEONE PARTNERS, LLC’S MOTION FOR PERMISSION TO FILE MOTION TO COMPEL IN EXCESS OF PAGE LIMIT

COME NOW Defendants MineOne Wyoming Data Center LLC, Terra Crypto Inc., and MineOne Partners, LLC (the “MineOne Defendants”) by and through counsel, HATHAWAY & KUNZ, LLP, and LOEB & LOEB LLC, and hereby file this motion seeking the Court’s permission to file a twenty-five-page (25) Motion to Compel on September 20, 2024.

Judge Hambrick granted the MineOne Defendants permission to file a Motion to Compel on September 10, 2024. ECF No. 342. Local Rule 7.1(b)(1)(C) provides that non-dispositive motions can only contain ten pages unless there are complex or numerous legal issues justifying an extension. Here, MineOne needs additional pages for its Motion to Compel given the numerous legal issues encompassed within the Motion.

Judge Hambrick granted leave for the MineOne Defendants to file a Motion to Compel regarding issues including, among other things, Plaintiff’s failure to provide identification of custodians, Plaintiff’s failure to complete a good faith search from all custodians and devices, Plaintiff’s failure to produce WeChat messages and Slack messages, spoliation of evidence related to Plaintiff’s website, Plaintiff’s September 16, 2024 discovery responses (in the event a conferral could not be accomplished or is unproductive), settlement agreement terms between Defendant Bitmain Technologies Georgia Limited and Plaintiff, missing attachments in Plaintiff’s August 2024 document production, missing metadata related to videos produced in August 2024, and Plaintiff’s improper withholding of documents on its privilege log which are not privileged (if

conferral is not productive). The MineOne Defendants need an additional fifteen (15) pages to adequately brief all of these various topics.

Counsel for the MineOne Defendants conferred with counsel for Plaintiff. Counsel for Plaintiff objects to this Motion.

The MineOne Defendants respectfully request this Court's order allowing them to file a Motion to Compel of twenty-five (25) pages in length.

DATED this 19th day of September, 2024.

DEFENDANTS MINEONE WYOMING DATA
CENTER, LLC, MINEONE PARTNERS LLC,
AND TERRA CRYPTO INC.

By: /s/ Sean Larson

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CERTIFICATE OF SERVICE

This is to certify that on the 19th day of September, 2024, a true and correct copy of the foregoing was served upon counsel as follows:

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